

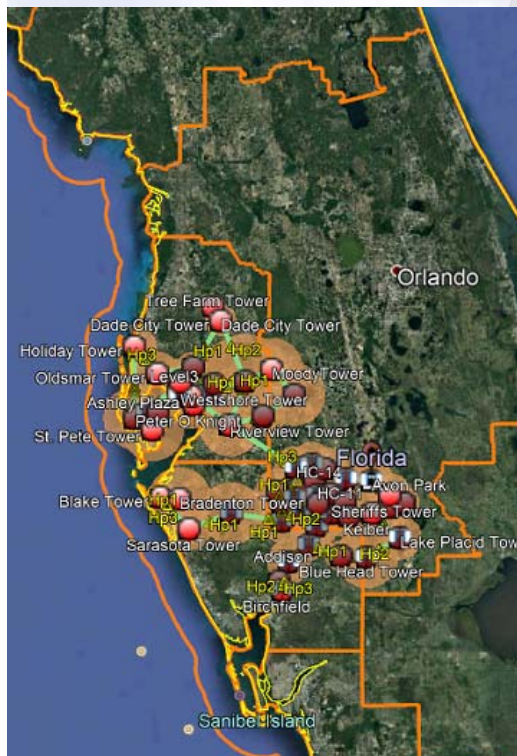
December 28, 2017

Rapid Systems, Inc. Florida CBRs Comments

Rapid Systems Inc. is a small service provider in the state of Florida started in 1996 and is currently providing Wireless Internet Service for 11 Counties and thousands of people. We employ over 30 people. We provide 3 different price models depending on the county our clients live in and investment density. The least expensive service is in Hardee county. This county has been designated a Rural Economically Disadvantaged County in our state since a majority of the population lives under the poverty level. We started highspeed services where the only option was satellite or dialup. Our services are from 5/1M to 25/5M.

Rapid Systems has invested close to a million dollars in hardware and labor for 3650-3700 MHz relying on the rules adopted after April of 2015, and millions of dollars in WiMAX 3650 gear before April. This band enabled us to be up first after Hurricane Irma – crucial communications and services restored before cable, copper and fiber.

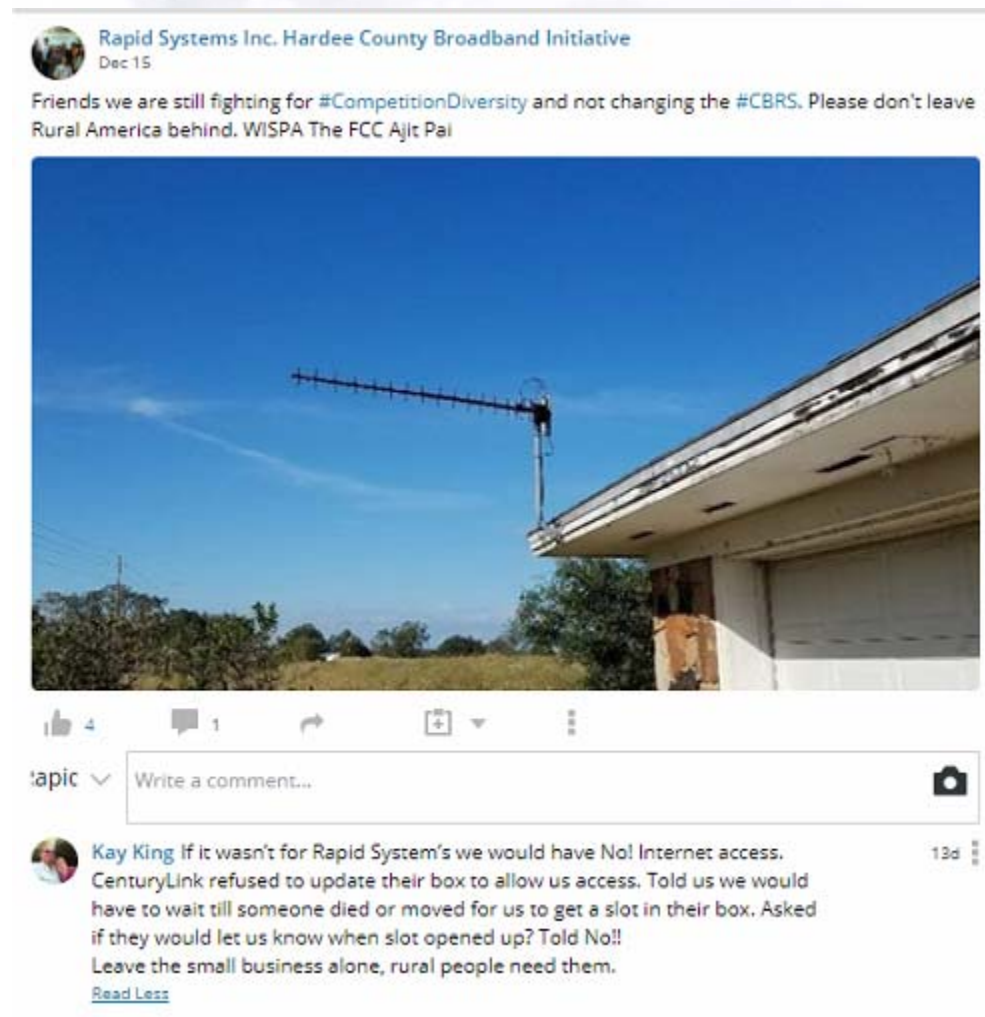
The new geographic area PAL's covers a very large land mass in comparison to census tract areas. For example, Rural Hardee County is in the same PAL as Metropolitan Orlando. Because we will have to acquire a much larger area than we plan to use to connect unserved and/or provide better service to our existing customers, this new area will dramatically reduce our ability to make competitive bids at the PAL auction. ALSO THE PAL AREA INCLUDES over 27,258 ACRES OF DISNEY PROPERTY. What this will do is enable large providers to ignore critical service areas and focus on Orlando and beachhead properties, leaving Florida's Rural Area of Economic Concern further separated from high speed broadband. In the diagram below our network is the red dots and the orange lines are the new proposed areas.



Since 2010 when we have extended services to Rural Floridians in Hardee, Desoto and Highlands Counties focusing on Rural Americans that lacked any broadband or choice.

Rapid Systems opposes the proposals to increase the size of PALS or lengthen the term of licenses.

Our customers have been speaking up on our FB pages. Here is one example:



Our customers depend on quality broadband service and they will be underserved should we not be able to acquire spectrum, increase penetration and broadband package sizes. Affordable spectrum is key to bridging the digital divide in Rural Florida and that includes enough spectrum to offer packages up to 100+ megabits of service.

Sincerely,

Denise Hamilton

Denise Hamilton
Rapid Systems, Inc.
CFO/VP